

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	
	§	
STANFORD INTERNATIONAL BANK,	§	Civil Action No. 3:09-CV-0721-N
LTD.,	§	
	§	
<i>Debtor in a Foreign Proceeding.</i>	§	

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**JOINT LIQUIDATORS' EMERGENCY MOTION FOR LEAVE  
TO PURSUE PROFESSIONAL NEGLIGENCE CLAIMS**

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COME NOW Hugh Dickson and Marcus Wide (together, the “JLs”), the duly-appointed joint liquidators of Stanford International Bank, Ltd. (“SIB”) in SIB’s liquidation proceeding pending before the High Court of Antigua and Barbuda in Antigua, and file this Emergency Motion for Leave to Pursue Professional Negligence Claims (the “Motion”) respectfully stating as follows:

1. Through the Motion, the JLs seek leave from the broad litigation stay imposed by the Court’s Second Amended Order Appointing Receiver [Dkt. #1130] (the “Receivership Order”) to pursue negligence, malpractice, breach of fiduciary duty, and/or similar claims against third-party professionals that facilitated Stanford’s fraudulent scheme (collectively, “Professional Claims”). Specifically, the JLs seek leave to pursue Professional Claims against Proskauer Rose LLP, Chadbourne & Parke LLP, Hunton & Williams LLP, and Greenberg Traurig LLP (collectively, the “Attorney Defendants”). The JLs further seek the Court’s support in pursuing

Professional Claims, including directing applicable third parties to produce SIB's records and any related documents to the JLs.

2. For the reasons detailed in the JLs' brief in support of the Motion filed contemporaneously herewith, the JLs contend that leave to pursue Professional Claims is both authorized by applicable case law and necessary to ensure that applicable statute of limitations periods do not bar Professional Claims from ever being pursued. Accordingly, granting the JLs leave to pursue Professional Claims is in the best interests of all victims/creditors and is warranted under the circumstances.

3. Also, because the statute of limitations periods for Professional Claims in some jurisdictions have already expired and others will expire as soon as February 2012, the JLs seek an emergency hearing on this matter.

WHEREFORE, PREMISES CONSIDERED, the JLs respectfully request that the Court enter an order: (i) granting them relief from the Receivership Order's litigation stay for the limited purpose of pursuing Professional Claims against the Attorney Defendants; (ii) directing third parties to produce SIB's records and any related documents to the JLs; (iii) setting an emergency hearing on this matter for the earliest available date and time and, if possible, no later than January 23, 2012; and (iv) granting the JLs such other and further relief to which they are justly entitled.

Dated: January 13, 2012

Respectfully submitted,

**REID COLLINS & TSAI LLP**

By: /s/ William T. Reid IV

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**COUNSEL FOR HUGH DICKSON AND  
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BANK, LTD.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on this 13th day of January, 2012, he caused a true and correct copy of this pleading to be serviced on all parties requesting electronic notice via the Court's ECF system and he also caused a true and correct copy of this pleading to be served on all parties listed on the attached Service List via first class U.S. mail, postage prepaid.

/s/ Nathaniel J. Palmer

Nathaniel J. Palmer

**CERTIFICATE OF CONFERENCE**

William T. Reid and P. Jason Collins, counsel for Marcus A. Wide and Hugh Dickson, the duly-appointed liquidators of Stanford International Bank Ltd., met and conferred in-person on January 13, 2012, with Kevin Sadler, counsel for Ralph Janvey, the court-appointed receiver for various Stanford related entities, regarding the relief requested in this motion. Mr. Sadler indicated at this meeting that Mr. Janvey opposes the relief requested in this motion. Additionally, William T. Reid met and conferred with Ed Snyder, counsel for the Official Stanford Investors Committee, and John Little, the court-appointed examiner by phone and email, respectively, on January 13, 2012. The Official Stanford Investors Committee and John Little also indicated that they oppose the relief requested herein.

/s/ William T. Reid IV

William T. Reid IV